We would urge the Commission both to carefully consider those comments and to weigh them against our arguments. The question for the Commission is whether, as we believe, the public interest warrants immediate repeal or whether deferral for further study would be more appropriate.

III. THE COMMISSION SHOULD AFFIRM AND EXTEND ITS "30 VOICES" TEST AS THE SOLE CROSS-OWNERSHIP WAIVER STANDARD

The Notice requests comment on various proposals for modification of the radio-television cross-ownership rule, which prevents a party from having ownership interests in a television station and a radio station in the same market.[50] We believe the Commission should affirm and extend its "30 voices" test as the sole cross-ownership waiver standard.[51] The "30 voices" test should apply to any market, not just the top 25, in which 30 'independent voices' would remain. The "30 voices" criterion when combined with the ownership limits under the respective rules for each service is all that is necessary in the vast majority of cases to protect the Commission's diversity and competition goals.

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[50] Notice at paragraph 22. The rule, which is also referred to as the "One-To-A-Market" Rule, is found at 47 C.F.R. § 73.3555(b).

[51] Under current waiver policy, if the proposed combination would result in any one entity holding an attributable interest in more than one AM and one FM radio station within any single television "metro" market, the "30 voices" test would not apply. Instead, the applicant would be required to demonstrate that the proposed combination would "provide unique public interest benefits." <u>One-To-A-Market Reconsideration Order</u> at paragraph 26.

In adopting the original "30 voices/top 25 Markets" cross-ownership waiver standard in 1989, the Commission found that the criteria for waiver were stringent enough to provide a "safety net" that would preserve diversity and competition. The potential efficiency gains and programming (and other) benefits of allowing joint station operations were seen to outweigh any diversity benefits of ownership that is more highly dispersed.[52]

In its initial Report and Order relaxing the radio ownership rules, the Commission stressed that the growth in the number and variety of media outlets has become even more pronounced since 1989.[53] The result has been market fragmentation and serious economic stress to many participants in the radio business. In light of these developments, the Commission found that the existing rules may actually hamper competition by denying stations efficiencies through consolidation. The Commission found that relaxation of the local radio ownership rules supports diversity and competition "by recognizing that the existence of a vibrant marketplace is necessary to maximize those goals."[54]

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[52] One-To-A-Market Order at paragraphs 28 and 83.

[53] Radio Ownership Report at paragraphs 35-36. Earlier Commission decisions also documented the tremendous growth in media outlets in markets of all sizes. E.g., Radio Contour Order at paragraphs 12-14, 28-30.

[54] Radio Ownership Report at paragraph 3.

In relaxing the radio ownership rules, the Commission built in a "safety net" -- numerical caps designed to preclude a single owner or group of owners from threatening to dominate the radio market through the acquisition of a large number of stations in any given location.[55] These caps were reduced and the "safety net" expanded after reconsideration. The Commission's local television ownership rules are designed to provide similar protection. In either case, the numerical caps would foreclose combinations that would result in excessive concentration.

The extension of the radio-television cross-ownership waiver standard we are proposing would in no way disturb these "safety nets." In fact, an owner proposing a combination involving television and radio stations in the same market would be required to satisfy both the "30 voices" criterion and the numerical caps conditions under the television and radio ownership rules. In such situations, where there is "little possibility" that relaxation of ownership rules would result in "competitive or diversity harm," licensees should be "afforded the opportunity to exploit any possible efficiency from group ownership."[56]

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[55] Id. at paragraphs 41-47. Those numerical caps have been modified on reconsideration, but the policy basis, the preservation of competition and diversity, remains the same. August 5, 1992 News Release.

[56] Ownership Report and Order at paragraph 86.

The more stringent of the alternative cross-ownership proposals the Commission offers for comment -- permitting ownership of one AM, one FM and one TV station in a market or permitting only TV/AM combinations -- would penalize group owners who operate in both television and radio. Thus, the owner of a radio station could, under the new local radio ownership rules, acquire up to an additional three radio stations in the same market (in markets with 15 or more stations) while the owner of a television station in the market would be limited to either one or two additional radio stations under the Commission's alternative proposals.

There is no rationale for treating television station owners less favorably than radio station owners. If a proposed combination reduces diversity or competition in the radio marketplace by creating common ownership of more than one radio station in a service, the effect is the same whether or not the group owner also owns a television station. In either case, the numerical caps would foreclose combinations that would result in excessive concentration.

Similarly, if one looks at the total local broadcast marketplace, in the vast majority of cases diversity or concentration concerns are addressed and resolved by the "30 voices" test. If the applicant's ownership of a television station in the community brings down the number of separately owned broadcast outlets to 30 or below, the combination would fail the 30 voices test.

There are also strong affirmative reasons for giving television owners the same opportunities for increased radio station ownership. As the Commission recognized in the Radio Ownership proceeding, applicants for radio-television cross-ownership waivers under the relaxed waiver standard have demonstrated that joint operation of radio and television stations in the same locality can result in significant cost savings.[57] It would be ironic indeed if the demonstrated efficiencies of television/radio combinations (which the Commission cites to support its belief in the potential efficiencies of radio/radio combinations) were not viewed as significant enough to permit television owners the same opportunities for increased radio ownership under the new rules.

Finally, there is no need to limit the benefits of a relaxed one-to-a-market waiver standard to the top 25 markets. The key element in assuring vigorous competition and diversity in a local broadcast market is the number of separately-owned media outlets. A "market rank" cut-off is nothing more than an indirect way of measuring "voice count" based on the assumption that the larger markets will contain more media outlets than smaller markets. The Commission has acknowledged that it is a less than accurate measure: although "[t]here is a correlation between market rank and the

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[57] Radio Ownership Report at paragraph 38.

number of stations or station owners ... this correlation is not perfect."[58] We would propose use of the more direct "voice count" test as the sole criterion. Once a minimum number of broadcast voices has been selected as the basis for allowing TV-radio combinations under the One-To-A-Market waiver standard, an additional market rank criterion becomes redundant.[59]

The Commission's adoption of the Top 25 Markets criterion in the original One-To-A-Market decision was substantially based upon three factors: (a) parties in the proceeding had suggested a market rank cut-off; (b) the Commission had used similar market definitions in other regulations and (c) it reflected an "abundance of caution" which the Commission thought prudent in liberalizing its waiver policy.[60]

None of these reasons affords a viable policy basis for retaining this separate criterion. Even when, on reconsideration, it rejected the suggestion that the market cut-off standard could be eliminated, the Commission

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[58] One-To-A-Market Order at paragraph 80 (emphasis supplied).

[59] We note that the Commission's new radio ownership rules rely upon the number of stations, rather than market rank, to determine market size: "As the record establishes, competitive realities are substantially different in markets of different sizes. Therefore, we have adopted a numerical cap which varies based on the number of radio stations competing in the market." Radio Ownership Report at paragraph 41 (emphasis supplied).

[60] One-To-A-Market Order at paragraphs 78-79.

acknowledged that it "[did] not disagree, in the abstract, with the basic proposition that the number of voices present in a market provides a more direct measure of competition and diversity than the size of the market involved."[61]

We believe that the time is now ripe for the Commission to squarely recognize that the presence of 30 independent voices in any market is likely to ensure sufficient diversity and competition, regardless of market size.[62] Given that the measure of individual voices in a market is more accurate than a market rank criterion, we urge the Commission to affirm and extend the "30 voices" test as the sole cross-ownership waiver standard.

IV. THE "DOMINANT STATION RULE" SHOULD BE ELIMINATED.

The Commission's rule regarding network ownership of stations prohibits a network from owning a television station in an area where the facilities are so few or of such unequal desirability that competition would be substantially restrained.[63] This rule, which was adopted in 1941 as one of

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[61] <u>One-To-A-Market Reconsideration</u> at paragraph 14.

[62] Notice at paragraph 28.

[63] The rule provides: Network ownership of stations. No license shall be granted to a network organization, or to any person directly or indirectly controlled by or under common control of a network organization, for a television broadcast station in any locality where the existing television broadcast stations are so few or of such unequal desirability (in terms of coverage, power, frequency, or other related matters) that competition would be substantially restrained by such licensing. (The word "control," as used in this section, is not limited to full control

the Chain Broadcasting Rules applicable to radio, had two major purposes: to prevent the domination of smaller markets by radio networks; and to prevent those networks from "bottling up" the best facilities, thus making them unavailable to new networks.[64]

We believe this rule should be repealed. Not only is it unnecessary to achieve the purposes it was designed to encourage, it may in fact be counterproductive by raising an obstacle to network ownership of small market television stations which may be in most need of economic revitalization.

There is little, if any, danger of network "domination" of communications outlets in small markets. There has been unprecedented growth in the number and variety of media outlets in markets of all sizes. As the Commission notes, the average television market now has approximately seven licensed commercial television stations. Even in those TV ADI markets ranked 126 to 150, there are on average six over-the air broadcast signals. In sharp contrast, there were

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but includes such a measure of control as would substantially affect the availability of the station to other networks.) 47 C.F.R. §73.658(f).

[64] Report on Chain Broadcasting and Order in Docket No. 5060 (May 2, 1941), aff'd sub nom. National Broadcasting Company v. United States, 319 U.S. 190 (1943). The Chain Broadcasting Rules were summarily applied to television in 1946 without modification or substantial comment. Amendment of Part 3 of The Commission's Rules, 11 Fed. Reg. 33 (1946).

six on-air television stations in the entire country in 1946.[65] Cable television did not exist.[66] In addition, the growth in other video and radio outlets has been similarly dramatic since 1946.[67] Today's marketplace bears not the slightest resemblance to that of 1946.

It was precisely this kind of change in the marketplace that led the Commission to eliminate most of the Chain Broadcasting Rules for radio in 1977:

> [U]nder present circumstances vastly different from those dealt with in the Chain Broadcasting Report ... , these regulations are unnecessary simply because (under vastly different circumstances and with sharply reduced "network dominance"), the abuses and practices dealt with are unlikely to develop to any substantial extent. ... Moreover, even if undesirable situations develop in a few cases, these will be so small in light of the vastly increased number of stations, and the greater number of networks, that no significant harm to the overall public interest would be expected.[68]

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[65] Notice at paragraph 36, note 61; Overview of TV Industry, p. 2. An average 3.3 commercial television stations are licensed to markets ranked 151+. However, viewers in these markets have available to them through cable and other sources an average of 45 television channels. Source: Nielsen Station Index, County/Coverage Study 1992. DMA Summary Volume.

[66] The first cable television systems were introduced in 1948, and then only as a rudimentary community antenna service. Brenner, Daniel L. and Price, Monroe E. Cable Television and Other Nonbroadcast Video -- Law and Policy (Clark Boardman Company, Ltd., New York, NY 1988), pp. 1.2 - 1.3.

[67] Notice at paragraph 36, note 61; Id. at paragraph 37; Radio Ownership Report at paragraphs 35-36; Radio Contour Order at paragraphs 12-14, 28-30.

[68] Report, Statement of Policy and Order in Docket No. 20721, 63 FCC 2d 674, 40 Rad. Reg. 2d (Pike & Fischer) 80 (1977) ("Radio Deregulation Order") at paragraph 10.

The analogy to the changes in the video marketplace is compelling.

The rule is not necessary to encourage the growth of new networks. The Commission carefully examined this rationale when it decided to eliminate the two-year "term of affiliation rule, which was based on the assumption that existing networks could "tie up" broadcast outlets via lengthy affiliation agreements, thereby removing these stations as potential affiliates for new networks."[69] It concluded that:

> Existing networks have ... not been able to foreclose the entry of new networks in recent years, and taken as a whole, we believe the current video marketplace is so diverse and so complex that they will not be able to take such action in the future.[70]

In particular, the Fox Broadcasting Company was able to establish a national network, and other regional, occasional and special broadcast networks have developed (e.g., Home Shopping Network and Univision). Similarly, there is ample evidence that new networks have developed, and will continue to do so, in the cable industry.[71] Given these developments, there is no need for the minimal (and theoretical) protection for the development of new networks thought to be afforded by

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[69] Network Affiliation Contracts (Two-Year Rule), 66 Rad. Reg. 2d (Pike & Fischer) 190 (1989) ("Two-Year Rule").

[70] Id. at paragraph 20.

[71] The Notice indicates that national basic cable networks increased from 34 in 1982 to 80 in 1990. It also notes the existence in that year of 9 national pay cable networks, 8 national pay-per-view services and 38 regional networks. Paragraph 34.

this rule.

Moreover, prohibiting network ownership of small market television stations may in fact be contrary to the public interest. Although television stations in markets of all sizes could benefit from consolidation with financially stable group ownership, the Commission has noted the OPP conclusion that it was more "pessimistic" about the "future prospects" of smaller market stations.[72] To the extent that network companies wish to invest their financial resources in smaller market stations, they should be permitted to do so without having to overcome unnecessary regulatory hurdles.[73]

Finally, the fact that this prohibition has been raised only six times as a bar to station acquisitions, and never successfully,[74] substantially underscores its insignificance in the overall framework of Commission regulation. To the extent a station acquisition involves potential restraint of competition, of course, the Commission has a full opportunity, and an obligation, to assess that possibility as part of its normal approval process.

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[72] Id. at paragraph 12, note 24.

[73] This rule was initially adopted in the Chain Broadcasting Report, which relied upon the definition of "network" found in the Communications Act of 1934: "simultaneous broadcasting of an identical program by two or more interconnected stations." 47 U.S.C. §153(p). The rule thus restricts the competitive opportunities of not only ABC, CBS and NBC, but also new networks such as Fox, and non-traditional and regional networks as well.

[74] Notice at paragraph 37.

V. THE "FORCED AFFILIATION" RULE SHOULD BE ELIMINATED.

Section 73.658(l) of the Commission's rules is relevant in television markets in which there are two stations affiliated with one of the three traditional broadcast networks and one or more stations without such an affiliation. It requires that the "unaffiliated" network offer its programming to the unaffiliated station before offering it to either of the affiliated stations.[75] As the Notice indicates, the practical effect of the rule is to force that network to affiliate with the unaffiliated station if its programming is to be broadcast in that market on a regular basis.[76] We believe the rule should be repealed.

At the time the rule was established in 1971, the Commission was concerned that networks would bypass unaffiliated UHF stations in favor of stronger VHF facilities, thus stunting the growth of UHF stations and the development of the nation's television system in general. The Commission specifically hoped to foster "voluntary affiliation on a regular basis with ... UHF station[s] ... [with] comparable facilities." [77] The rule was also designed to give independent

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[75] 47 C.F.R. §73.658(l). The rule is also referred to as the "Fifteen Hour" or "Forced Affiliation" Rule.

[76] Notice at paragraph 39.

[77] First Report and Order in Docket No. 18927, Amendment of Section 73.658 of the Commission's Rules to Limit Television Stations' Access to the Programs of More Than One National Network, 21 Rad. Reg. 2d (Pike & Fischer) 1638 (1971) ("Forced Affiliation Order") at paragraphs 36-37.

stations maximum access to programming.[78]

In today's broadcast environment, these concerns have lost their vitality. The country's over-the-air broadcast system has developed thoroughly, if not completely: the number of television stations has grown from 881 in 1971 to 1497 today,[79] including 817 UHF stations on the air, up from 292 in 1971.[80] In addition, opportunities for new affiliations with the three traditional broadcast networks, which the rule was meant to encourage, are severely limited. Each of those networks covers 99% of all television homes in the country.[81] Independent stations have a multitude of program sources from which to choose, including new sources for first-run syndicated programming.[82]

A peculiarity of the rule today (at a time that Fox has become the fourth national network) is that it would give a Fox station (which is "unaffiliated" within the meaning of the rule) a priority, for example, over CBS or NBC affiliates for access to ABC network programming. The ABC Affiliate

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[78] Notice at paragraph 41.

[79] Broadcasting, August 17, 1992 at p. 45.

[80] Id.; Television & Cable Factbook, Services Volume at p. G-3 (1992).

[81] Source: Nielsen Television Index

[82] E.g., Notice at paragraphs 34 and 41; Report and Order in MM Docket No. 90-162, Evaluation of the Syndication and Financial Interest Rules, 69 Rad. Reg. 2d (Pike & Fischer) 341 (1991) at paragraph 133.

Marketing and Research Department has identified eleven markets in which there are two television stations affiliated with ABC, CBS or NBC and one "unaffiliated" station within the meaning of the rule.[83] Of these stations, six are in fact affiliated with the Fox Broadcasting Company.[84] Thus, the majority of stations in potential markets currently within the rule already have a network affiliation, and therefore are not "independent" or "unaffiliated" in the sense contemplated by the Commission in 1971.[85]

Finally, the rule imposes this restriction only on the three traditional broadcast networks and allows other program distributors complete flexibility to choose their program outlets. This condition is not rational in the competitive video marketplace that the networks face today.[86]

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[83] These markets are listed in Exhibit B. We did not determine which of the unaffiliated stations have "reasonably comparable facilities," so it is likely that this list overstates the number of markets in which the rule could be currently invoked.

[84] Source: Television & Cable Factbook, Stations Volume (1992).

[85] This analysis also indicates that the rule is currently of very limited applicability. While the Commission noted that its limited applicability in 1971 did not "remove the need for it in the public interest, in the situations to which it applies" (Forced Affiliation Order at paragraph 36), it also noted that there was a "large number of markets" in which it could potentially apply (id. at paragraph 37). That does not appear to be the case today, particularly since in many of the markets identified, the "unaffiliated" station is in fact affiliated with Fox.

[86] Upon reconsideration of the rule, the Commission stated:

> "The three national networks are sufficiently 'different' from such other [program] sources - for example, in their

In any market in which a network is currently without an over-the-air affiliate, that network should be free to choose the outlet that will maximize its circulation.[87] Any other approach would unreasonably interfere with the network's ability to distribute its programming in the manner that best serves its competitive interests. Retention of the rule would represent a government subsidy for "unaffiliated" stations that cannot be justified in today's competitive broadcast environment. Accordingly, the rule should be repealed.

> method of program distribution and provision of advertising support for broadcasting, and in the crucial importance of their programming to the viability of stations outside of the largest markets ... - to warrant treatment which is, to a degree, disparate. ... As some of these other sources approach similarity in the three national networks in some of the pertinent respects - for example, the national sale by syndicators of some of the commercial slots in the programs they furnish to stations - it may be appropriate to adopt regulations as to them."

Memorandum Opinion and Order in Docket No. 18927, 22 Rad. Reg. 2d (Pike & Fischer) 1723 (1971) at paragraph 26. Given the development of the over-the-air broadcasting system, we believe the rule is no longer necessary and should be eliminated rather than extended to other program suppliers.

[87] Placing programming on an unaffiliated station involves expense to the network, including, e.g., the costs of administrative time, advertising and promotional materials, obtaining and shipping temporary decoders to unscramble the network signal.

CONCLUSION

For the reasons set forth above, Capital Cities/ABC respectfully urges the Commission to modify its regulations in the manner we have suggested.

Respectfully submitted,

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August 24, 1992

EXHIBIT A

Analysis of OC/UCC Study

The ABC Affiliate Marketing and Research Department has reviewed the Study conducted by the Office of Communications of the United Church of Christ (OC/UCC) regarding ownership of television stations.

We do not believe the OC/UCC Study is representative of local television markets or stations in general.

From a methodological perspective, the OC/UCC Study encompassed only five television markets and by our calculations, only 23 television stations. This sample represents a mere 2% of all markets/stations in the country. This sample is further diluted as the OC/UCC subdivides these stations into three groups based on ownership characteristics. These sub-groups do not offer projectable samples nor do they take into account other factors that influence whether station owners are able to reinvest funds into local public affairs programming.

Even if one were to accept this study from a methodological standpoint, one could by no means arrive at the OC/UCC's conclusions regarding the differences between individually and group owned stations in respect to the amount of local/national programming aired. While we are unable to test for statistical significance based on the information given, the differences outlined in their findings (Exhibits X and XI) would appear to be insignificant from a practical standpoint. In fact, certain conclusions reached by the OC/UCC in regard to local news actually contradict the basis of their local public affairs argument.

A more detailed analysis of the problems follows.

From a methodological perspective, a review of the "parameters and methodology section" of this Study does not provide adequate information in order to test the statistical significance of their findings. However, from a practical point of view, it does not appear that the sample utilized in this analysis provides a representative look at local television markets or stations in general:

A total of five television markets were selected for this analysis. This represents a mere 2% of all the television markets in the country as defined by Arbitron (210 markets) and Nielsen (211 markets). In fact, according to Nielsen, these five markets represented only 2.1% of all U.S. households during the 1988-89 broadcast season.

In terms of the number of television stations analyzed, our analysis of these five markets indicate that only 23 television stations were on the air in both 1984 and 1989; the two years utilized in the OC/UCC comparison. Once again, this total represents only 2% of the 1,128 commercial television stations on the air.

In a move that further dilutes this limited sample, the OC/UCC divided these 23 stations into three sub-groups based on ownership classifications:

"Class A stations" -- Individually owned in both 1984 and 1989.

"Class B stations" -- Group owned in 1984 and individually owned in 1989;

or

Group owned in 1984 and 1989, but the group owner had fewer properties in 1989.

"Class C stations" -- Individually owned in 1984 and group owned in 1989;

or

Group owned in both years and the group owner held the same number of properties in 1984 and 1989;

or

Group owned in both years and the group owner acquired additional properties after 1984.

Our analysis indicates that only two of the total 23 stations fall within the OC/UCC "Class A station" grouping (note: we were unable to duplicate the OC/UCC's exact source of its ownership listings -- the 1984 and 1989 Broadcasting Yearbook. In its place we used a comparable source -- the Television and Cable Factbook for both years in question). Both of these stations -- KORO/Corpus Christi and KPDX/Portland, OR are UHF independent facilities. Thus, the OC/UCC's entire argument concerning individually owned "Class A stations" appears to be based on a sample of only two stations.

Another problem with these groupings is that they fail to take into account other factors that influence whether a group owner is able to reinvest funds into local public affairs programming. Among these factors may be the size of the debt service incurred by the station owner.

For example, under the OC/UCC definition, the ABC affiliate in Portland, OR, KATU, would be classified as a "Class C station." KATU has been owned by Fisher Broadcasting, Inc. since its sign-on in 1962. Fisher's only other TV property to date is KOMO-TV in Seattle, WA, which the group has owned outright since 1959.

However, under the OC/UCC rationale, a similar "C" classification would be applied to WMKW, the Fox affiliate in Memphis, TN. WMKW's owners, TVX Broadcast Group (formerly the Television Corp.), owned twice as many TV outlets in 1989 (ten) than they did in 1984 (five). In fact, the group incurred such debt, they eventually declared bankruptcy and are no longer in the station business.

It should be expected that these group owners would have varying funds available to reinvest into their stations. Yet despite these differences, the OC/UCC places both stations under the same station classification.

Even if one were to accept this study from a methodological standpoint, the findings detailed in Exhibit X by no means allow one to come to the OC/UCC's conclusion that "local public affairs in the surveyed markets was primarily aired by the individually owned stations...."

This OC/UCC conclusion is based on a differential of four minutes of programming per day between the individually owned ("Class A") stations and those in the group owned "Class C" category. As detailed in Exhibit X, "Class A stations" program 2.2% of their 6:00 AM - 12:00 AM schedule (or 23.8 minutes per day) with locally produced public affairs programming. This figure is only .4% higher than that of group owned "Class C stations" (1.8% or 19.4 minutes).

While the OC/UCC points out that "Class A and Class B stations" provided more local public affairs programming between 1984 and 1989, it fails to mention that group owned "Class C stations" significantly increased their commitment as well. As detailed in Exhibit X, local public affairs programming on "Class C stations" increased 38% during the five year period analyzed.

In fact, the OC/UCC's comments concerning Exhibit XI are in direct contradiction to its conclusions regarding local public affairs programming. The OC/UCC indicates that "the amount of local news aired provided by group and individually owned stations was about the same." Yet a review of these figures indicates that group owned stations provide an average of 11 minutes more local news per day than individually owned stations (7.2% vs. 6.2%). This differential is almost three times as great as that found with local public affairs, yet is considered to be "about the same" by the OC/UCC.

One last point, concerning the amount of national news/public affairs programming. The OC/UCC claims the data indicates that group owners rely more heavily on national news and public affairs programing than individually owned stations.

Our research indicates that 12 of the 17 stations designated as "Class C stations" are network affiliates. Through their networks, network affiliates have easier access to national news programming and would be expected to program more national news than their independent counterparts (the two "Class A stations").

In addition, national public affairs programming represents the type of syndicated programming that is prevalent on network affiliates during their locally programmed time periods. In comparison, independent stations tend to rely on "off-network" programming (e.g., situation comedies) or children's animated fare.

Thus, we believe the differences regarding the amount of time the OC/UCC's "Class A" and "Class C" stations program national news/public affairs programming are not reflective of the differences associated with station ownership, but are more related to the differences between the types of stations (independents vs. network affiliates) themselves.

Prepared By:

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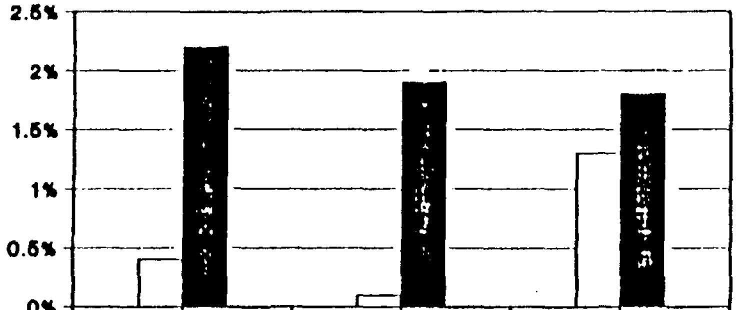
EXHIBIT X.

A

COMPARSION OF LOCAL PUBLIC AFFAIRS BY OWNERSHIP CHARACTERISTICS

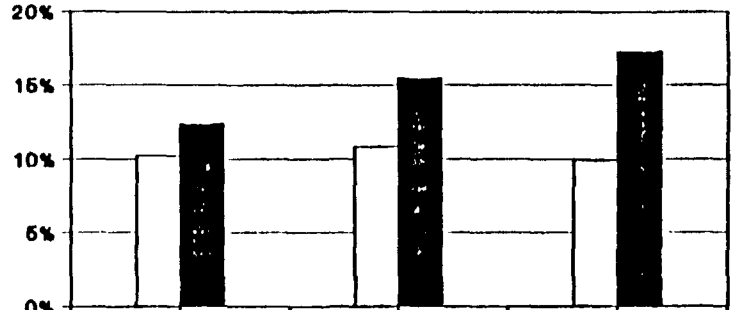


	Class A Stations	Class B Stations	Class C Stations
1984	0.4%	0.1%	1.3%
1989	2.2%	1.9%	1.8%

A = individually owned in '84 and '89.
B = ownership smaller in '89 than in '84
C = ownerhip larger in '89 than in '84.

B

COMPARSION OF NATIONAL PUBLIC AFFAIRS BY OWNERSHIP CHARACTERISTICS



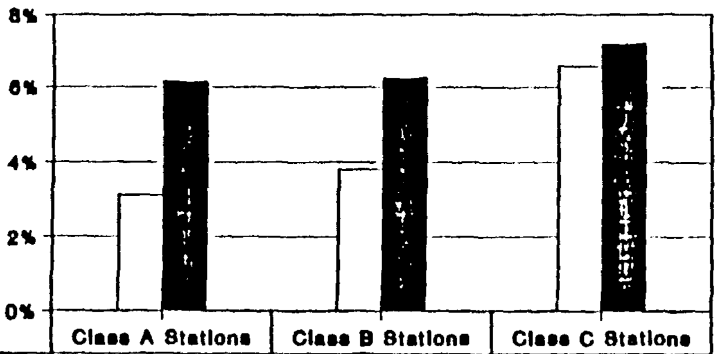
	Class A Stations	Class B Stations	Class C Stations
1984	10.2%	10.8%	9.9%
1989	12.4%	15.5%	17.3%

A = individually owned in '84 and '89.
B = ownership smaller in '89 than in '84
C = ownerhip larger in '89 than in '84.

EXHIBIT XI.

A

COMPARSION OF LOCAL NEWS BY OWNERSHIP CHARACTERISTICS

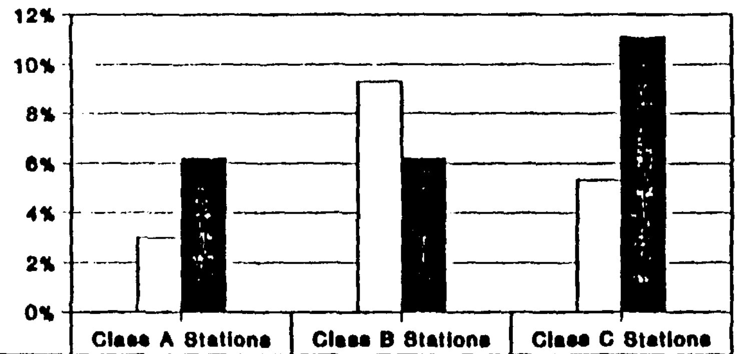


	Class A Stations	Class B Stations	Class C Stations
1984	3.1%	3.8%	6.6%
1989	6.2%	6.3%	7.2%

A = individually owned in '84 and '89.
B = ownership smaller in '89 than in '84
C = ownerhip larger in '89 than in '84.

B

COMPARSION OF NATIONAL NEWS BY OWNERSHIP CHARACTERISTICS



	Class A Stations	Class B Stations	Class C Stations
1984	3%	9.3%	5.3%
1989	6.2%	6.2%	11.1%

A = individually owned in '84 and '89.
B = ownership smaller in '89 than in '84
C = ownerhip larger in '89 than in '84.

Markets With Two Network Affiliates and Independent Stations

		ABC Affil.	CBS Affil.	NBC Affil.	Existing Ind.
Albany, GA	Call Letters	WVGA	--	WALB	WFXL (Fox)
	Channel #	44	--	10	31
Clksbrg-Wstn	Call Letters	--	WDTV	WBOY	WLYJ (Independent)
	Channel #	--	5	12	46
Dothan	Call Letters	WDHN	WTVY	--	WDAU (Fox)
	Channel #	18	4	--	34
Fairbanks	Call Letters	KATN	KTVF	--	KJNP (Independent)
	Channel #	2	11	--	4
Florence, SC	Call Letters	WPDE	WBTW	--	WGSE (Carolina Christian
	Channel #	15	13	--	43 Broadcasting)
Lafayette, LA	Call Letters	KATC	KLFY	--	KADN (Fox)
	Channel #	3	10	--	15
Laredo	Call Letters	--	KVTV	KGNS	KLDO (Telemundo)
	Channel #	--	13	8	27
Panama City	Call Letters	WMBB	--	WJHG	WPGX (Fox)
	Channel #	13	--	7	28
Quincy-Hnnibl	Call Letters	--	KHQA	WGEM	WTJR (Independent)
	Channel #	--	7	10	16
San Angelo	Call Letters	--	KLST	KACB	KIDY (Fox)
	Channel #	--	8	3	6
Utica	Call Letters	WUTR	--	WKTV	WFXV (Fox)
	Channel #	20	--	2	33

Source: Nielsen Station Index, 1991-92 Broadcast Season

EXHIBIT B